

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHAUN GRAY, an individual,

Plaintiff,

v.

PARAMOUNT GLOBAL, a Delaware
corporation; PARAMOUNT PICTURES
CORPORATION, a Delaware corporation;
PARAMOUNT STREAMING SERVICES
INC., a Delaware corporation; and DOES 1-10,

Defendants.

Case No. 1:25-cv-03484-JSR

**DEFENDANTS' NOTICE OF ERRATA TO DECLARATION OF MOLLY M. LENS
IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

NOTICE OF ERRATA

Defendants Paramount Global, Paramount Pictures Corporation, and Paramount Streaming Services, Inc. (“Defendants”) respectfully submit this Notice of Errata to the Declaration of Molly M. Lens in Support of Defendants’ Motion to Dismiss Plaintiff’s Complaint (ECF No. 22) (“Lens Declaration”) and Exhibit E (ECF No. 22-5) thereto.

The Lens Declaration identifies the final screenplay for *Top Gun: Maverick* (“*Maverick*”) as the document attached thereto as Exhibit E. As originally filed, the Lens Declaration attached as Exhibit E the “Cherry Shooting Draft” of the screenplay for *Maverick*, dated November 25, 2019. At the time, Defendants’ counsel believed that draft to be the final screenplay, and indeed, nearly all filming for *Top Gun: Maverick* had already concluded as of that date (and post-production had already begun). However, this week, Defendants’ counsel came to appreciate that there is a later screenplay draft called the “Second Blue Revision Shooting Draft,” dated February 8, 2020. As compared to the Cherry Shooting Draft, the Second Blue Revision Shooting Draft implemented isolated incremental revisions to the screenplay. Defendants’ counsel has confirmed that this inadvertent mistake affects no statements made in Defendants’ papers (beyond Paragraph 6 of the Lens Declaration).

Accordingly, PPC will correct this inadvertent error by filing a corrected Declaration of Molly M. Lens in Support of Defendants’ Motion to Dismiss Plaintiff’s Complaint, which will attach the Second Blue Revision Shooting Draft in lieu of the Cherry Shooting Draft and, in Paragraph 6, list the corresponding Bates range for that document.

Dated: July 11, 2025

By: /s/ Molly M. Lens

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